

# Skagit County Prosecuting Attorney Richard A. Weyrich

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September 25, 2018

Honorable Scott S. Harris Clerk of the Court Supreme Court of the United States 1 First Street, NE Washington, DC 20543

RE: Jason Boyd, Petitioner v. Washington United States Supreme Court No. 18-39

Dear Mr. Harris,

I am currently listed as the Counsel of Record according to the Docket of the Court for the respondents in the above-referenced case. I am not yet admitted to the United States Supreme Court Bar Association. If Arne Denny, a member of my office admitted to practice before the Court, is able to get his electronic filing privileges activated, I will file this request for an extension of time through the electronic filing portal. He has consented to the use of his electronic filing privileges and appearance for the purposes of entering this request.

The Court called for a response to the Petition for Certiorari. That response is due October 1, 2018.

Pursuant to Rule 30.4, the respondent respectfully requests an extension of time, for three weeks, to October 22, 2018, to file the Brief in Opposition. The first basis for the extension is to allow the completion of my admission to the United States Supreme Court Bar Association. The application was delivered Thursday, September 13, 2018. I have yet to hear on my application. In addition, this is the first response to a Petition for Certiorari I have handled; and it is taking longer than anticipated to complete the response. The additional basis for extension is that I was out of the office on September 12, 2018, and 13, 2018, due to hospitalization of a relative in another part of the state. Finally, prior to receiving the Petition,

Main Office 605 S. Third Street Mount Vernon WA 98273 (360) 416-1600 Fax: (360) 416-1648 prosecutor@co.skagit.wa.us

#### **Civil Division**

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I committed to be part of an appellate presentation for continuing legal education the Washington Association of Prosecuting Attorneys from September 26, 2018 through September 28, 2018.

I spoke with counsel for the petitioner and the petitioner consents to this extension. A three-week extension will be adequate to complete the Brief in Opposition, and I believe that the extension will not delay the Court's consideration of the Petition.

Yours Very Truly,

Erik Pedersen, Senior Deputy Prosecutor.

EP/kw

cc: Leonard J. Feldman Lila J. Silverstein

## **CERTIFICATE OF SERVICE**

I, Karen Wallace, hereby certify (or declare) that the letter dated September 25, 2018, to Scott Harris, Clerk of the Court of the United State Supreme Court seeking extension of time to prepare a brief in opposition to the petition for writ of certiorari in *Jason Boyd v. State of Washington, 18-039* was sent via United States Postal Service to the

SUPREME COURT OF THE UNITED STATES

1 First Street, NE

Washington, DC 20543,

and copies were sent via United States Postal Service and email to the following parties listed below, this 25th day of September, 2018.

Counsel for Respondent

Lila J. Silverstein, Counsel of Record WASHINGTON APPELLATE PROJECT 1511 3<sup>RD</sup> Avenue, Suite 610 Seattle, WA 98101 (206) 587-2711 Iila@washapp.org

Leonard J. Feldman PETERSON WAMPOLD ROSATO FELDMAN LUNA 1501 4<sup>th</sup> Avenue, Suite 2800 Seattle, WA 98101 (206) 624-6800 feldman@pwrfl-law.com

I further certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. This Certificate is executed on September 25, 2018, at Mount Vernon, WA.

an Wallace

Karen Wallace, Skagit County Prosecuting Attorney's Office 605 South Third Street Mount Vernon, WA 98273 (360) 416-1600

CERTIFICATE OF SERVICE Page 1 of 1 SKAGIT COUNTY PROSECUTING ATTORNEY 605 S. 3RD ST. -- COURTHOUSE ANNEX MOUNT VERNON, WASHINGTON 98273 FAX: (360) 416-1480 - PH: (360)416-1600